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8 Attorneys for Defendants A.V.E.L.A., Inc.,  
9 X ONE X Movie Archive, Inc.,  
10 Central Mills, Inc.(Freeze) and Leo Valencia

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 Fifty-Six Hope Road Music, Ltd. and Zion  
14 Rootswear, LLC,

15 Plaintiffs,

16 v.

17 A.V.E.L.A., Inc., X ONE X Movie Archive,  
18 Inc., Jem Sportswear, Central Mills, Inc.  
19 (Freeze), and Leo Valencia,

20 Defendants.

21 AND RELATED COUNTERCLAIM  
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1 Defendants A.V.E.L.A., Inc. ("AVELA") and Central Mills, Inc. ("Freeze")  
2 hereby submit this Motion to File Documents Under Seal and the [Proposed] Order filed  
3 concurrently herewith. Defendants respectfully request that the Court accept and  
4 maintain, under seal, the following documents:  
5

6 (a) Exhibits A, B, C and D to the Declaration of Randi Rosenstein, which  
7 consist of documents that show Freeze's total sales and costs for the Marley product; and  
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9 (b) Exhibit C to the declaration of Leo Valencia which includes financial  
10 records, and d

11 (c) Exhibits A, B, C, D and E to the Declaration of Liza Acuna which consist  
12 of documents reflecting AVELA's sales, costs and financial records.  
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14 On December 2, 2008 a Protective Order was entered by this Court pursuant to  
15 Fed. R. Civ. P. 26 (c). The Protective Order contemplated that there might be  
16 confidential information in this case, and that when such information is contained in a  
17 document to be filed with the Court, that such filing would be done under seal. In this  
18 case, above declarations refer to exhibits that have been designated "Confidential" under  
19 the Protective Order (although some were not stamped as such) and are required to be  
20 filed under seal. Redacted versions of the declarations were filed electronically on July  
21 5, 2011.  
22

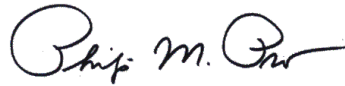
23 In compliance with the Protective Order, the documents described above should  
24 be accepted and maintained by the Court under seal, pursuant to the stipulated Protective  
25 Order and pursuant to Fed. R. Civ. P. 26 (c).  
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1 DATED: July 5, 2011

THE BALL LAW FIRM, LLP

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4 By: /s/ Douglas D. Winter  
DOUGLAS D. WINTER  
5 Attorneys for Defendants A.V.E.L.A.,  
6 Inc. and Freeze

7 IT IS SO ORDERED.

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11 PHILIP M. PRO  
12 UNITED STATES DISTRICT JUDGE

13 Dated: April 12, 2012.